

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

**JAMES ALSTON, CARNELL BULLOCK,
COREY GLEATON, MARK HILTON,
ZACHARY JENKINS, JAMES KILE,
RHETT LINLEY, JEFFREY NAVES,
JOHN MCPHERSON, NOLAN PEGUES,
JOSEPH ROBINSON, ALAN RYMAN,
CARL SIMON, and KHEHADI WATKINS,**

Plaintiffs,

v.

**DIRECTV, INC., DIRECTV, LLC, and
MASTEC NORTH AMERICA, INC.**

Defendants.

**Case No. 3:14-cv-04093-JMC
District Judge J. Michelle Childs**

**PLAINTIFFS' UNOPPOSED MOTION TO
REOPEN THE MATTER FOR PURPOSES
OF SETTLEMENT APPROVAL**

Plaintiffs James Alston, Carnell Bullock, Corey Gleaton, Mark Hilton, Zachary Jenkins, James Kile, Rhett Linley, John McPherson, Jeffrey Naves¹, Nolan Pegues, Joseph Robinson, Alan Ryman, Carl Simon, and Khehadi Watkins (“Plaintiffs”), by and through their undersigned counsel, move the Court to reopen the above-captioned matter to permit Plaintiffs to submit a motion for approval of the settlement on or before July 23, 2018. Specifically, Plaintiffs will move for approval of the settlement agreements that each of them has reached with Defendant DIRECTV, LLC (“DIRECTV”), on its behalf and on behalf of any predecessor entities including the entity sued as DIRECTV, INC.,² and Defendant MasTec North America, Inc. (“MasTec,”

¹ Plaintiffs’ counsel was recently informed that Plaintiff Naves has passed away. Thus, prior to submitting the motion for approval of settlement, counsel will take action consistent with South Carolina probate and/or estates law to account for Mr. Naves’ passing.

² DIRECTV, INC. is not an existent entity.

and collectively with DIRECTV, “Defendants”). Defendants do not oppose Plaintiffs’ request to reopen this matter.

On March 26, 2018, the Court entered an order dismissing the action without costs and without prejudice “to satisfy internal docketing considerations.” (Dkt. No. 185). The Court further provided that any party may move to reopen the matter within ninety days of the order and that the Court “shall retain jurisdiction to make such further orders as may be necessary or appropriate.” (Dkt. No. 185, at pg. 1-2). By way of this Motion, Plaintiffs request that the Court reopen this matter and permit them to file a motion for approval of their individual settlement agreements with Defendants on or before July 9, 2018. The instant request is being made within ninety days of the March 26 Order.

Counsel for Plaintiffs, Todd Werts, has consulted with counsel for Defendants, Christina Tellado regarding the instant motion. Defendants are not opposed to the relief sought herein.

Dated: June 25, 2018

Respectfully submitted,

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/s/ Milford O. Howard, III

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CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2018, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Milford O. Howard, III
